

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

In re:	§	
	§	
JOHN ANDREW GOODMAN	§	Case No. 24-10806-SMR
	§	Chapter 7
Debtor.	§	
.....	§	

**AGREED MOTION TO EXTEND DEADLINE TO FILE A  
COMPLAINT PURSUANT TO 11 U.S.C. § 523 AND/OR 11 U.S.C. § 727**

FedEx Supply Chain Logistics & Electronics, Inc. (“FSCLE”) by its undersigned counsel, respectfully submits this agreed motion (“Motion”) for entry of an order granting an extension of time to February 28, 2025 for FSCLE to file a complaint (i) objecting to the discharge of John Andrew Goodman (the “Debtor”) pursuant to 11 U.S.C. § 727 and/or (ii) objecting to the dischargeability of the FSCLE debt pursuant to 11 U.S.C. § 523(c) pursuant to Federal Rules of Bankruptcy Procedure 4004(b), 4007, and 9006 and Local Rule 9014(d)(3). In support of this request, the FSCLE states as follows:

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (J).
2. On July 10, 2024, the Debtor filed this bankruptcy case under Chapter 7 of Bankruptcy Code. John Patrick Lowe (the “Trustee”) was appointed to serve as Trustee in the case and continues to serve in that capacity. The meeting of creditors was held pursuant to 11 U.S.C. § 341 (the “341 Meeting”) on August 15, 2024, and is continued to December 16, 2024. Doc. No. 122.

3. The current bar date for filing complaints under 11 U.S.C. §§ 523(c) and 727 is December 15, 2024. This motion is timely filed pursuant Fed R. Bankr. P. 4004(b). 4004(b). While this motion is pending, the Court should not grant a discharge to Debtor. Fed R. Bankr. P. 4004(c)(1)(E).

4. The Debtor has already agreed to the same extension and relief requested in this motion with the U.S. Trustee and the Trustee. *See* Doc. No. 138.

5. Fed R. Bankr. Bankruptcy Procedure 9006(b)(3) specifically provides that a court may enlarge the periods for filing complaints objecting to discharge pursuant to Fed. R. Bankr. P. 4004(a) and 4007(c).

6. Local Rule 9014(d) provides that motions to enlarge time pursuant to Fed. R. Bankr. P. 9006 may be granted without a hearing.

7. On December 3, 2024, Debtor's counsel informed counsel for FSCLE by email that the Debtor agreed to the requested extension to February 28, 2025.

8. Cause exists in this case to enlarge the periods for filing complaints pursuant to Fed. R. Bankr. P. 4004(a) and 4007(c) and the requested extension is not sought for the purpose of delay.

Wherefore, FSCLE requests the Court extend the deadline for FSCLE to file a complaint objecting to the discharge of the Debtor pursuant to 11 U.S.C. § 727 and/or object to the dischargeability of the FSCLE debt pursuant to 11 U.S.C. § 523(c) to February 28, 2025 and for such other and further relief as the Court deems appropriate in this matter.

Dated: December 3, 2024

Respectfully submitted,

**BUTLER SNOW LLP**

/s/ R. Campbell Hillyer

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*Attorneys for FSCLE*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 3, 2024, I conferred with counsel for the Debtor via email and he informed me that the Debtor agrees to the request by FSCLE for an extension of time to file a complaint objecting to the discharge of the Debtor pursuant to 11 U.S.C. § 727 and/or object to the dischargeability of the FSCLE debt pursuant to 11 U.S.C. § 523(c) to February 28, 2025.

/s/ R. Campbell Hillyer

R. Campbell Hillyer

**AGREED:**

/s/ Martin Seidler

Martin Seidler #18000800

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*Counsel for the Debtor*

**Certificate of service**

I hereby certify that a true and correct copy of the foregoing Motion and proposed order were served upon the parties listed below in the manner indicated, and/or by electronic means for all Pacer system participants on December 3, 2024.

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/s/ R. Campbell Hillyer  
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